

EXHIBIT 4

Bryson, Santana and Joshua v. Rough Country, LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

SANTANA BRYSON and JOSHUA BRYSON,)
as Administrators of the Estate)
of C.Z.B., and as surviving)
parents of C.Z.B., a deceased)
minor,)

Plaintiffs,

vs.

ROUGH COUNTRY, LLC,

Defendant.

) No.
) 2:22-cv-17-RWS
)
)
)
)
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)

VIDEOTAPED DEPOSITION OF CHARLES CROSBY, P.E.
Phoenix, Arizona
May 14, 2024
9:00 a.m.

REPORTED BY:

Robin L. B. Osterode, CSR, RPR
CA Certified Shorthand Reporter No. 7750
AZ Certified Reporter No. 50695

1 BY MS. CANNELLA:

2 Q. It's quite significantly higher than yours,
3 correct?

4 MR. HILL: Same objection.

5 THE WITNESS: My understanding is it is
6 higher than mine, yes.

7 BY MS. CANNELLA:

8 Q. You're not offering an opinion in this case
9 regarding whether or not the lift kit is defective;
10 is that right?

11 A. That's correct.

12 Q. You know a gentleman named Bob Lang at
13 Exponent, correct?

14 A. I know the name, yes.

15 Q. And he's a former General Motors employee,
16 are you aware of that?

17 A. I believe so, yes.

18 Q. And he works for Exponent now?

19 A. Yes.

20 Q. Would it be fair to characterize Mr. Lang
21 as the grandfather of automotive expert testifiers?

22 MR. HILL: Object to the form.

23 Go ahead.

24 THE WITNESS: I don't know that I could
25 characterize him as that.

1 STATE OF ARIZONA)
COUNTY OF MARICOPA)

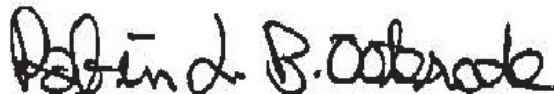
3 CERTIFICATE

4 I, ROBIN L. B. OSTERODE, Certified Shorthand
5 Reporter for the State of California and Certified
6 Reporter for the State of Arizona certify:

7 That the foregoing proceeding was taken by
8 me; that I am authorized to administer an oath; that
9 any witness, before testifying, was duly sworn to
10 testify to the whole truth; that the questions and
11 answers were taken down by me in shorthand and
12 thereafter reduced to print by computer-aided
13 transcription under my direction; that review and
14 signature was requested; that the foregoing pages are
15 a full, true, and accurate transcript of all
16 proceedings, to the best of my skill and ability.

17 I FURTHER CERTIFY that I am in no way
18 related to nor employed by any of the parties hereto,
19 nor am I in any way interested in the outcome hereof.

20 DATED this 28th day of May, 2024.

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23 

24 ROBIN L. B. OSTERODE, CSR, RPR

CA CSR No. 7750

25 AZ CR No. 50695